REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claims 25, 31, 39, 47, and 48; claims 26 and 32 have been canceled; no new claims have been added. Applicant respectfully submits no new matter has been added. Accordingly, claims 25, 27-33, 38, 39, 47, and 48 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 25-33, 38-39, 47 and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Vialen et al. (Pub. No. 2002/0019241) in view of Ahmavaara, et al. (Patent No. 6,792,278). The Applicant respectfully traverses the rejection of these claims.

As previously noted, the Applicant discloses a method and system for connecting a multi-mode mobile telecommunication device by paging the device over one access network for setting up a connection using a second access network. An example was given; that of setting up a connection for a group 3 facsimile transmission over a UMTS access network. As UMTS does not support such group 3 transmissions, it is necessary to set up a connection over a GSM network. For a device that has already connected to a UMTS network, a paging message is sent over the UMTS access network containing the identity of the network over which to receive the fax, in this case the GSM network.

The present invention solves a problem that is not addressed by any of the prior art references. It represents a solution, which will allow different access networks to provide overlapping coverage for a multi-mode telecommunications device. The term multi-mode telecommunications device with respect to the Applicant's disclosure is defined as a device capable of communicating with telecommunication networks that operate on different frequencies or networks that operate using different access technologies. Examples are: in the case of different frequencies a 800/900/1900 mhz GSM mobile phone, and in the case of different access technologies, a WCDMA/GSM

dual mode phone. If the mobile device is served by two or more access networks, a paging signal may be sent over an access network preferred by the sending entity. The invention allows for determining which of the connected access networks can support a particular call and then routing that particular call over the access network that can support that call.

The Vialen reference discloses a paging control method and apparatus. The paging method relates to mobile stations that are capable of listening to both GSM and GPRS systems. Vialen provides a solution to the problem of a paging request arriving from a packet switched network (GPRS) if a circuit switched call (GSM) is active. Vialen sends a multicall paging message to a mobile station and waits for a multicall paging response. The call goes over the connected network and the response is received over the connected network.

The Ahmavaara reference discloses a system and method for providing contactability information regarding a mobile station. The database includes the mobile station's location information, information about existing signaling connections and information about the primary paging channel monitored by the mobile station. (Abstract) The Ahmavaara reference discloses that the information database is consulted when a page for the mobile station comes in and rather than paging the mobile station, the data from the database is utilized to page the mobile and the paging channel load in the cells is reduced because no paging process is needed for incoming calls if a data connection already exists (Col. 2, lines 41-44).

The Applicant respectfully directs the Examiner's attention to amended independent claim 1.

> 25. (Currently Amended) A method of initiating a connection to a multi-mode mobile telecommunication device via one of a plurality of access networks, wherein the multi-mode telecommunication device is adapted to operate on two or more radio frequencies or two or more mobile telecommunication access networks, the method comprising the step of
>
> sending a paging message to the mobile telecommunication device from a core network, the paging message specifying a preferred one of the plurality of access networks for the connection, and

> receiving a paging response signal from the mobile telecommunication device to the core network over the preferred one of the plurality of access networks, and subsequently setting up the connection over the preferred one of the plurality of access networks. (emphasis added)

The Applicant respectfully submits that neither Vialen nor Ahmavaara teach or suggest the emphasized limitations.

Vialen discloses two core networks being able to page a mobile station over the network that the mobile station is connected to, but does not disclose the mobile station communicating over a network preferred by the paging network. Ahmavaara discloses consulting a database with the mobile station location information in order to save paging channel load. The Applicant discloses sending a paging message over one network indicating a preferred network for communication via the core network and the mobile station responds to the page over the preferred network. Neither Vialen or Ahmavaara, individually or in combination, teaches or suggests sending over one network a message that indicates a preferred network over which to communicate. The Applicant respectfully requests the withdrawal of the rejection of claim 25 and the associated depending claims 27-30 and amended claim 48 since the claims are analogous and contain similar limitations.

Claim 31 as amended now includes the subject matter not taught or suggested in either Ahmavaara or Vialen. This being the case, the Applicant respectfully requests the withdrawal of the rejection of this claim.

Claim 32 has been canceled. Claim 47 as amended now includes the subject matter not taught or suggested in Ahmaavara or Vialen. The Applicant respectfully requests the withdrawal of the rejection of this claim.

Claim 33 depends from claim 31 and contains the same novel subject matter.

With regard to Claim 38, Vialen is cited as teaching transmitting a paging response signal over the preferred mobile access network. The cited portion of the Vialen reference appears to discuss a multicall page being transmitted over an existing signal link via a radio network controller that is connected to the mobile station and the non-coordinated network. This allows a page to be transferred from a non-coordinated network to a mobile station that is connected to another non-coordinated network. There is no suggestion or teaching of the mobile station responding over a preferred network. The Applicant respectfully requests the withdrawal of the rejection of this claim.

Amended claim 39 contains similar limitations to claim 25 except that the preferred channel can not support the preferred channel. Then a different channel is established to the mobile station. The Applicant respectfully requests the withdrawal of the rejection of this claim.

Prior Art Not Relied Upon

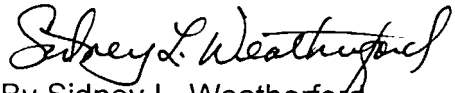
In paragraph four on page seven of the Office Action, the Examiner stated that the prior art made of record and not relied upon is considered pertinent to the Applicant's disclosure.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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